

Message

From: Palmer, Daniel [Palmer.Daniel@epa.gov]
Sent: 10/5/2021 3:56:26 PM
To: Adrienne Pennington [Adrienne.Pennington@floridadep.gov]; Alan York [alan.york@adeq.state.ar.us]; Angela.Marse@LA.GOV; Tennille Thomas [Tennille.Thomas@tceq.texas.gov]; anna.truszczynski@dnr.ga.gov; Arno Laud [arno.laud@maryland.gov]; billings.jim@deq.state.or.us; Brian Ham [Brian.Ham@tn.gov]; Siders, Catherine [Catherine.Siders@Illinois.gov]; Grady, Charles [CGRADY@idem.IN.gov]; charles.garcia@deq.ok.gov; Coleman, Connie [connie.coleman@dnr.ga.gov]; Mindi Cross [cross.mindi@azdeq.gov]; Monk, Christy [cvm@adem.alabama.gov]; tamara.dahl@state.mn.us; Danielle Clements [danielle.clements@tceq.texas.gov]; Hannasch, Dawn K (DEC) [dawn.hannasch@alaska.gov]; Deborah Mendenhall [Deborah.Mendenhall@ks.gov]; Lutz, Daphne Y [dlutz@adem.alabama.gov]; edanderson@adem.alabama.gov; Erica Fey [erica.fey@tn.gov]; Mustain, Erin@Waterboards [Erin.Mustain@waterboards.ca.gov]; FREY Martina * DEQ [frey.martina@deq.state.or.us]; HEALEYR [HEALEYR@adeq.state.ar.us]; HOUSE, JASON [JAHOUSE@idem.IN.gov]; Hopen, Jamie M [E025530@wv.gov]; Johnson, Jamie@Waterboards [jamie.johnson@waterboards.ca.gov]; jennifer.talley [jennifer.talley@tceq.texas.gov]; Davison, Jessica D (DEC) [jessica.davison@alaska.gov]; Jon van Dommelen [jon.vandommelen@epa.ohio.gov]; Joushua Rodriguez [joshua.rodriguez@dc.gov]; Julie Wandling [Julie.A.Wandling@wv.gov]; katherine.mccrea [katherine.mccrea@wyo.gov]; herbert.darling [herbert.darling@tceq.texas.gov]; Kathryn.Huddle@LA.gov; kelly.morgan@state.co.us; Kevin Campbell [kevin.campbell@wyo.gov]; kevin.wells [kevin.wells@wyo.gov]; Kristi.Savage-Clarke [Kristi.Savage-Clarke@dnr.mo.gov]; Leslie Allen-Daniel [ALLEN-DANIEL@adeq.state.ar.us]; Moser, Lucy [lucy.moser@epa.ohio.gov]; Lynley Doyen [lynley.doyen@tceq.texas.gov]; Macy Beauchamp [Macy.Beauchamp@tceq.texas.gov]; Cleland, Mark (EEC) [Mark.Cleland@ky.gov]; Buffleben, Matthew@Waterboards [Matthew.Buffleben@waterboards.ca.gov]; rmcc461@ecy.wa.gov; Davenport, Melanie (DEQ) [Melanie.Davenport@deq.virginia.gov]; Don Tuxill [don.tuxill@dec.ny.gov]; Munze, Karen (DEC) [Karen.Munze@dec.ny.gov]; nicole.smith@delaware.gov; padgitt.leigh [padgitt.leigh@azdeq.gov]; pschuett@nd.gov; Rachael McCrea rachel.mccrea@ecy.wa.gov [rachel.mccrea@ecy.wa.gov]; Ramsey@adeq.state.AR.us; Rich Paull [Rich.Paull@dep.nj.gov]; ryan.weiss@mt.gov; Samuel Kaplan [samuel.kaplan@dem.ri.gov]; Sarah Elias [Sarah.Elias@tn.gov]; Michelle.Schwank@dec.ny.gov; Holly Shear [holly.shear@dec.ny.gov]; Shelley Naik [shelley.naik@tceq.texas.gov]; Shelley Schneider [Shelley.Schneider@nebraska.gov]; Shelly.Shores-Miller@ks.gov; Wood, Steven J (DEC) [steven.wood@dec.ny.gov]; Streeter, Meredith (DEC) [meredith.streeter@dec.ny.gov]; Swanson, Charles [Swanson.Charles@epa.gov]; Atkinson, Tom [DNR] [tom.atkinson@dnr.iowa.gov]; Palmer, William [10007310@id.ohio.gov]; Jon Wendel [Jon.Wendel@alaska.gov]; lepo461@ecy.wa.gov; darryl.barton@mt.gov; Clark, Shaun P [Shaun.P.Clark@wv.gov]
CC: Bellefuil, Emma [Bellefuil.Emma@epa.gov]; Ragnauth, Elizabeth [Ragnauth.Elizabeth@epa.gov]; Wasem, Russell [Wasem.Russell@epa.gov]; McAnallen, Rachel [Mcanallen.Rachel@epa.gov]; Boeglin, Michael [Boeglin.Michael@epa.gov]; Smith, Johanna [Johanna.Smith@dnr.ga.gov]; Harsh, Chad [Harsh.Chad@epa.gov]; Aubuchon, Elizabeth [aubuchon.elizabeth@epa.gov]; Bahr, Ryan [bahr.ryan@epa.gov]; Beese, Jennifer [beese.jennifer@epa.gov]; Bragan, Mary Jo [Bragan.Maryjo@epa.gov]; Dart, Denny [Dart.Denny@epa.gov]; Dever, Mary [Dever.Mary@epa.gov]; Gilbert, Neal [Gilbert.Neal@epa.gov]; Greenwald, Kathryn [Greenwald.Kathryn@epa.gov]; Green, Katherine [Green.Katherine@epa.gov]; Heminway, Seth [Heminway.Seth@epa.gov]; Herrera, Esteban [Herrera.Esteban@epa.gov]; Jencius, Michele [jencius.michele@epa.gov]; Edelbrock, Judy [Edelbrock.Judy@epa.gov]; Magnan, Eric [Magnan.Eric@epa.gov]; Pollard, Stephen [Pollard.Stephen@epa.gov]; Lopez, Josie [Lopez.Josie@epa.gov]; Hollimon, Shelia [Hollimon.Shelia@epa.gov]; Huffman, Diane [Huffman.Diane@epa.gov]; Levo, Brian [Levo.Brian@epa.gov]; Modigliani, Justine [Modigliani.Justine@epa.gov]; Sean Rolland [srolland@acwa-us.org]; VanTil, Barbara [vantil.barbara@epa.gov]; Kadish, Rochele [Kadish.Rochele@epa.gov]; Theis, Joseph [Theis.Joseph@epa.gov]; Smith, Molly [Smith.Molly@epa.gov]; Rathbone, Colleen [Rathbone.Colleen@epa.gov]; Piantanida, David [Piantanida.David@epa.gov]; Rodriguez, Jason [Rodriguez.Jason@epa.gov]; McKenna, Douglas [McKenna.Douglas@epa.gov]; Matthews, Rachel [Matthews.Rachel@epa.gov]; Kenknight, Jeff [Kenknight.Jeff@epa.gov]; Smalley, Bryant [smalley.bryant@epa.gov]; Pratt, Stacie [Pratt.Stacie@epa.gov]; Gardner, Patricia [patricia.gardner@dep.nj.gov]
Subject: New SNC NCI Top 200 SNC Effluent Violators List - Based on FY 2021 Q3 SNC Data
Attachments: Copy of Top 200 SNC-Level Effluent Violations by States FY21 Q4 - based on Q3 official data.xlsx

SNC NCI State Workgroup Members,

Attached is the new, quarterly prioritized “Top 200” SNC-Level Effluent Violators list - based on the official FY 2021 Q3 SNC data. These lists are generated each quarter by the SNC NCI Steering Committee using the “Violation Tracker” tool in ECHO (that uses state and EPA data from EPA’s ICIS-NPDES data system) that prioritizes SNC-level effluent violators based on three criteria: 1) the # of quarters of SNC (45%), 2) the total amount of pollution discharged over limit (45%), and 3) the toxic weighted amount of pollutants discharged over limit (10%). **Based on this algorithm, the “worst” SNC-level effluent violators are prioritized with the “worst” violators at the top of the list.**

You will notice that the top rows on the list are highlighted in yellow. These yellow highlighted rows identify the facilities that are among the top 200 “worst” effluent violators nationally according to the ranking described above (45%-45%-10%).

New for this quarter, in an effort to help prioritize the Top 200 SNCs, you will also notice that some of the yellow rows are now highlighted in orange. These orange highlighted rows identify the facilities that have been among the top 200 “worst” effluent violators nationally for the last four consecutive quarters. We encourage states to take action in support Goal 2 of the NCI to address these serious SNC violators.

New instructions: To find the top effluent SNC violators in the attached Excel spreadsheet for your state:

- 1) Click the dropdown arrow at the top of Column E (“cwp_state using LEFT function from source_id”).
- 2) Click “Filter” and select your state from the dropdown arrow.

Key points about the lists:

1. You will notice that several top rows in the spreadsheet have been highlighted in yellow and orange indicating that these facilities that are among the top 200 “worst” effluent violators nationally (according to the ranking described above (45-45-10)). Orange indicate that the violator has been in SNC for the past four consecutive quarters.
2. The column, “**National Rank,**” indicates each facility’s national ranking of the FY 21 Q3 total 5418 facilities in SNC downloaded from the Violation Tracker Tool in ECHO. If you re-sort the list based on information in other columns this new column allows you to re-sort the list to its original prioritization.
3. The column titled, “**EJ Screen - # of EJ Indices over 80th %ile,**” provides a count of how many EJ Indexes from EJSCREEN are above the 80th percentile for the location of the facility. **This information can be used to focus added attention on facilities in your list that register higher for potential EJ concerns.**

As a reminder, we also have added the SNC Tracker’s prioritizing function (used to generate the attached list) to the “NPDES Early Warning SNC Dashboard” (in the ECHO GOV Data Visualization gallery). This allows EPA and state users to generate this same prioritized list from the Early Warning Dashboard – but, using the Early Warning Dashboard, you can also generate a prioritized SNC list based on both the unofficial quarter’s SNCs and the real-time SNCs from the present quarter. This gives you the option reviewing a much more recent set of SNCs and potentially intervening with these permittees early enough to prevent them from becoming official SNCs.

If we can provide you any support in using the Top 200 Effluent SNC list, or if you have any questions, please contact Rachel McAnallen of my staff (mcanallen.rachel@epa.gov).

Thank you.

Daniel Palmer, Deputy Director
Planning, Measures and Oversight Division
Office of Compliance, OECA
202-564-5034 (e)
202-904-3548 (c)